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October 1, 2021

VIA ECF

Honorable Ona T. Wang
United States Magistrate Judge
U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *BSG Resources (Guinea) Limited et al. v. Soros et al.*, 1:17-cv-02726 (JFK) (OTW)

Dear Judge Wang:

Pursuant to Section IV(a) of Your Honor's Individual Practices, Defendants request permission to file under partial seal the enclosed letter, which makes reference to Mr. Steinmetz's August 29, 2021, deposition testimony and correspondence to Your Honor that is currently under seal. Pursuant to Section IV.2.b the Stipulated Protective Order (ECF No. 81), on September 30, 2021, Mr. Steinmetz's counsel designated the entire transcript of Mr. Steinmetz's deposition as Confidential. While Defendants do not believe that Mr. Steinmetz's deposition testimony qualifies as Confidential, Defendants request to file the enclosed letter under partial seal to comply with the procedures for such designations under the Stipulated Protective Order.

Respectfully submitted,

/s/ Benjamin P. McCallen

Benjamin P. McCallen